



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 24, 2023

By ECF

Honorable Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States of America v. Robert S. Kelly,
Criminal Docket No. CR-19-0286 (EDNY)(AMD)

Dear Judge Donnelly:

The Government respectfully submits the attached Declaration in Support of an Order of Garnishment and proposed Order of Garnishment for Your Honor's review and signature. The proposed Order provides for the garnishment of music publishing royalties currently held by Universal Music Publishing, Inc. ("Universal") to satisfy the remaining balance of the Defendant's criminal monetary penalties. Defense counsel, Jennifer Bonjean, Esq., does not oppose this additional Order of Garnishment.

As the Court may recall, on August 23, 2023, Your Honor signed an Order of Garnishment with respect to the royalties held by Universal. *See* Dkt. Entry No. 369. The Order required the Garnishee, Universal, to issue a check payable to the Clerk of the Court "for the full amount of the restitution debt owed by the Defendant as of the date Universal Music Publishing receives the certified copy of the Order of Garnishment." *Id.* On August 23, 2023, the undersigned served Universal with a certified copy of the Order of Garnishment via electronic mail and overnight mail. The undersigned further informed counsel for Universal that, as of August 23, 2023, the Defendant owed \$507,234.05 in criminal monetary penalties. The Clerk of the Court received payment in the amount of \$507,234.05 on or about September 14, 2023. In the interim, however, interest accumulated on the Defendant's debt, leaving a balance of \$780.40 in interest.¹

In accordance with its obligation to seek full and timely payment of all criminal monetary penalties, including interest, the Government respectfully requests that the Court enter a second Order of Garnishment, directing Universal to issue a check, within ten days of receiving a certified copy of said Order, payable to the Clerk of the Court for \$780.40 to satisfy the Defendant's monetary penalties completely and fully.

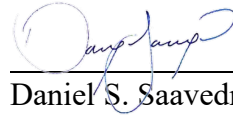
¹ Because this amount is pure interest, it is not accumulating interest.

The Government thanks the Court for its consideration of this matter.

Respectfully submitted,

Breon Peace
United States Attorney

By:



Daniel S. Saavedra
Assistant U.S. Attorney
(718) 254-6360